

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EDWARD DAYAN,

Plaintiff,

vs.

ELIE LEVY, MICHAEL KASSIN,
SPORTLIFE BRANDS, LLC, and
BLACKVIEW CAPITAL, LLC,

Defendants.

Case No. 23-cv-00113

STIPULATION

WHEREAS, the parties are in settlement discussions and in order to facilitate the continuation of these discussions, the parties, by their undersigned counsel, wish to amend certain deadlines set forth in the Minute Entry and Order docketed on May 9, 2023, and therefore;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, subject to order by this Court, as follows:

1. The time for amendment of the pleadings to add claims or join additional parties is hereby extended through and including September 16, 2024.
2. The date for the completion of fact discovery is hereby adjourned from January 10, 2024, until February 12, 2024.
3. The date for the exchange of Plaintiff's and Defendants' expert report(s) is hereby adjourned from February 1, 2024, until March 1, 2024. Rebuttal reports, if any, are hereby adjourned from March 5, 2024, until April 5, 2024.
4. The date for the completion of expert discovery is hereby adjourned from April 5, 2024, until May 6, 2024.
5. The last date to take the first step in dispositive motion practice is hereby adjourned from June 5, 2024, until July 5, 2024, for any motion pursuant to Fed. R. Civ. P. 12 or 56, or before filing a *Daubert* motion.

6. The date for submission of any protective order(s) with respect to Phase 2 discovery is hereby adjourned from August 30, 2023, until September 29, 2023.
7. The date for the parties to submit their respective *ex parte* settlement positions is hereby adjourned until no later than October 18, 2023, at 5:00pm.
8. The settlement conference scheduled for September 21, 2023, shall be adjourned to a date to be set by this Court.
9. Electronic and facsimile signatures on this stipulation shall be deemed originals for all purposes.
10. This Stipulation may be executed in counterparts, each of which shall be deemed an original, and all of which, taken together, shall constitute one and the same agreement. For purposes hereof, an electronic signature or image of a manual signature delivered by facsimile or electronic transmission shall be deemed an original manual signature.

Dated: Brooklyn, New York
August 8, 2023

LAZAR GRUNSFELD ELNADAV
LLP

By: /s/ Gerald Grunsfeld

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*Attorneys for Plaintiff Edward
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Dated: New York, New York
August 8, 2023

WACHTEL MISSRY LLP

By: /s/ Steven J. Cohen

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*Attorneys for Defendants Elie Levy, Michael
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Blackview Capital LLC*

SO ORDERED:

Hon. Sanket J. Bulsara